

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

JUAN MORGAN,	)	
Plaintiff,	)	
	)	
v.	)	Civ. No.: 05-989(RCL)
	)	ECF
MIKE JOHANNNS,	)	
Secretary, Dept. of Agriculture,	)	
	)	
Defendant.	)	
_____	)	

**DEFENDANT'S CONSENT MOTION TO AMEND  
THE COURT'S JANUARY 12, 2007 ORDER**

Pursuant to Fed. R. Civ. P. 6(b), Defendant respectfully moves the Court for a 60-day extension of all deadlines set forth in the Court's January 12, 2007 Order. Pursuant to Local Rule 7(m), the undersigned conferred with Plaintiff's counsel (Mr. John McHugh) and counsel consented to this motion. Although Mr. McHugh is Plaintiff's counsel, he is not admitted in this jurisdiction and has not made an appearance in this matter. Therefore, Plaintiff Juan Morgan is proceeding *pro se* in this action.

There is good cause to grant this Motion. On January 5, 2007, as a courtesy to the *pro se* plaintiff, Defendant moved for an extension of all deadlines by approximately three months because Plaintiff claimed that he was ill and could not respond to Defendant's discovery requests. See Dkt. No. 21. On January 12, 2007, the Court granted that motion and set March 15, 2007, as the deadline for all discovery. See Jan. 12, 2007 Order (Dkt. No. 22).

Defendant just learned from Plaintiff's counsel (Mr. McHugh) that Plaintiff is still ill and cannot respond to the outstanding discovery requests until the end of April. It also appears that Plaintiff has now found local counsel to represent him in this litigation. It is unclear when local

counsel intends to make his/her appearance.

In any event, in light of Plaintiff's medical conditions and as an accommodation to him, Defendant hereby seeks an extension of all deadlines to allow him time to recover from his medical conditions and respond to Defendant's discovery requests. This extension would also allow local counsel to become familiar with the case.

For these reasons, the Court should grant this consent motion and extend all deadlines as follows to allow the parties to complete discovery:

Events	Current Deadlines	Proposed Deadlines
Discovery	March 15, 2007	May 15, 2007
Dispositive Motions	April 15, 2007	June 15, 2007
Oppositions	May 15, 2007	July 15, 2007
Replies	June 1, 2007	August 1, 2007

Dated: March 16, 2007.

Respectfully Submitted,

/s/ Jeffrey A. Taylor  
JEFFREY A. TAYLOR, D.C. BAR # 498610  
United States Attorney

/s/ Rudolph Contreras  
RUDOLPH CONTRERAS, D.C. BAR #434122  
Assistant United States Attorney

/s/ John C. Truong  
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Attorneys for Defendant

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v.	)	Civ. No.: 05-989(RCL)
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MIKE JOHANNNS,	)	
Secretary, Dept. of Agriculture,	)	
	)	
Defendant.	)	
_____	)	

**ORDER**

Upon consideration of Defendant's Consent Motion to Amend the Court's January 12, 2007 Order and the entire record herein, it is this \_\_\_\_\_ day of \_\_\_\_\_, 200\_\_\_\_,

ORDERED that Defendant's Consent Motion to Amend the Court's January 12, 2007 Order be and is hereby GRANTED; and it is

FURTHER ORDERED that all deadlines shall be EXTENDED as follows:

Events	Deadlines
Discovery	May 15, 2007
Dispositive Motions	June 15, 2007
Oppositions	July 15, 2007
Replies	August 1, 2007

SO ORDERED.

\_\_\_\_\_  
U.S. District Judge

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on March 16, 2007, service of the foregoing  
Defendant's Consent Motion to Amend the Court's January 12, 2007 Order was made via the  
Court's Electronic Case Filing System and by first class, postage prepaid mail to *pro se* plaintiff  
and his counsel addressed as follows:

Juan Morgan  
Pro se Plaintiff  
PSC 2, Box 2814  
APO AA 34002

John F. McHugh, Esq.  
6 Water Street  
New York City, NY 10004

\_\_\_\_\_  
/s/  
JOHN C. TRUONG  
Assistant United States Attorney